



WA3019  
14F  
12/15/2017

December 15, 2017

Ms. Jan Palumbo (AWT-150)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101



FILE COPY

**Subject: November 2017 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the November 2017 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from November 15, 2017, to December 14, 2017.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- At the end of the last reporting period, EW-2 and EW-4 shut down after a storm. EW-2 came back online after the storm. EW-4 was manually restarted, but continues to shut down. There is no high water alarm, and thus, the added operation of EW-3 may be causing EW-4 to run dry. For this reporting period, extraction wells EW-1 through EW-3 and EW-5 operated at approximately 40 gpm.
- The sampling team conducted the Fourth Quarter Pilot Study sampling event this week.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period. EW-4 operation will be assessed.
- The SADD report will be prepared and submitted by December 31, 2017. The SADD report will include the third quarter sampling results.
- The CMS Version 4 was submitted during the First Quarter. We anticipate comments from EPA.

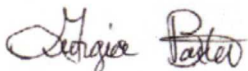


Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

### CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



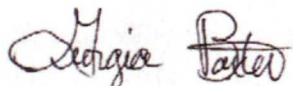
Name: Georgia Baxter

Title: Chief Executive Officer

Date: December 15, 2017

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Chris Martin, Ecology  
Jamie Hillery, Stella-Jones Corp.

